

1 HARRY A. MOORE  
Mohave County Public Defender  
2 State Bar No. 030370  
Attorney for Defendant  
3 318 N. Fifth Street  
PO Box 7000  
Kingman, AZ 86401  
4 Telephone: (928) 753-0734  
Fax No: (928) 753-0793

FILED  
BY: *fe*

2014 OCT -3 PM 3:19

VIRLYNN TINNELL  
SUPERIOR COURT CLERK

5  
6 **IN THE SUPERIOR COURT, DIVISION IV OF THE STATE OF ARIZONA**

7 **IN AND FOR THE COUNTY OF MOHAVE**

8 STATE OF ARIZONA,

9 Plaintiff,

10 vs.

11 JUSTIN JAMES RECTOR,

12 Defendant.

Case No.: CR-2014-01193

**MOTION FOR EXPERT FUNDS**

13 COMES NOW, the Defendant, JUSTIN JAMES RECTOR, by and through the  
14 Mohave County Public Defender's Office, counsel undersigned, and requests \$10,000 in  
15 initial funds to conduct a psychological evaluation.

16 Mr. Rector is charged with First Degree Murder, an offense that is potentially  
17 punishable by the death penalty. The Mohave County Attorney's Office has notified defense  
18 counsel that it is contemplating filing a Notice to Seek Death Penalty in this case. The  
19 prosecutor has invited the defense to proffer any proposed mitigation in an effort to dissuade  
20 it from filing the Notice. In order to adequately represent Mr. Rector and hopefully avoid  
21 filing of the Notice, the defense requires funding to hire a mental health expert and to obtain  
22 medical/mental health records.  
23  
24

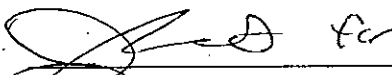


1 Counsel has already determined that Mr. Rector does suffer from some mental health  
2 issues. At this time counsel needs the assistance of a mental health expert to screen and/or  
3 diagnose any psychiatric disorders. The selected expert has estimated the cost at this stage to  
4 be approximately \$10,000.

5 To date, counsel has received minimal disclosure on this case. Additional areas  
6 requiring the assistance of an expert will likely arise as further information is disclosed, and  
7 as this case progresses.

8 Mr. Rector respectfully requests that this Court authorize an initial \$10,000 so that  
9 counsel can immediately hire the appropriate mental health expert to assist in acquiring  
10 mitigation that may persuade the prosecutor to not seek death in this case. Additional funding  
11 will be necessary if the State does elect to seek the death penalty or if this case is not quickly  
12 resolved.

13 DATED THIS 2ND DAY OF OCTOBER, 2014.  
14

15   
16 By: HARRY A. MOORE  
17 Mohave County Public Defender

18 A copy of the foregoing sent  
19 this 3<sup>rd</sup> day of October 2014 to:

20 Greg McPhillips, Deputy  
21 Mohave County Attorney's Office

22 Honorable Lee Jantzen

23 By:   
24  
25  
26